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Plaintiff's Counsel*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SANDAR M. MESA-PEREZ, an individual,  
  
Plaintiff,

v.

SBARRO LLC dba SBARRO PIZZA, a foreign  
limited liability company; SBARRO, INC. dba  
SBARRO PIZZA, a foreign corporation;  
ZACHARY CEBALLES, and individual;  
EFRAIN HERNANDEZ, an individual; JESUS  
ALATORRE, an individual; DANA DORADO,  
an individual,  
  
Defendants.

CASE NO. 2:19-cv-373-APG-NJK

**STIPULATION AND (PROPOSED)  
ORDER TO EXTEND TIME TO MEET  
AND CONFER REGARDING, AND IF  
NECESSARY BRIEF, THE AMOUNT OF  
SANCTIONS AWARD (DOCKET NO.  
177)**

The parties herein, by and through their attorneys of record, hereby stipulate and agree to the following:

1. On September 30, 2020, the Court issued an Order (1) Granting Dana Dorado's Motion for Sanctions Under Rule 11 and (2) Denying her Motion for Sanctions Under 28 U.S.C. §1927 and the Court's Inherent Powers [Doc 177].

2. In the Order, the Court directed that:

"The parties must confer about the amount of those fees and costs by October 28, 2020. If they agree with the amount, they shall file a stipulation. If no agreement is made, Dorado may file a motion with supporting affidavits and appropriate documentation requesting reasonable attorneys' fees and costs. That motion shall be filed by November 13, 2020." See Order p. 6:17-21.

3. The parties are in the process of conferring about the amount of the fees and costs in accordance with the above Order but need an additional period of time to complete the process.

4. The parties therefore agree and stipulate to request an additional period of thirty (30) days from October 28, 2020, up to and including **November 30, 2020**, to permit further discussion as part of the meet and confer process and, if necessary, for Ms. Dorado to file her motion for fees and costs. Any opposition shall be filed 25 days after the filing of Ms. Dorado's motion for fees and costs.

5. This stipulation is submitted based upon good cause and is not made for the purpose of delay.

Dated this 6<sup>th</sup> day of November, 2020

Dated 6<sup>th</sup> day of November, 2020

GREENBERG TRAURIG, LLP

LIPSON NEILSON P.C.

/s/ Jason K. Hicks

/s/ Joseph P. Garin

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Plaintiff's Counsel*

**ORDER**

IT IS SO ORDERED.

Dated: November 9, 2020

  
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UNITED STATES DISTRICT COURT JUDGE